

AFFIDAVIT OF GERARDO F. BRILLANTES

I, Gerardo F. Brillantes, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent of the Diplomatic Security Service ("DSS"), United States Department of State, and have been so employed for less than one year. I am currently employed in Headquarters, Criminal Investigations Division, Passport Fraud Branch. My responsibilities include the conducting of investigations into criminal violations of the laws governing the issuance of United States passports, visas and other travel documents used to transit international borders.

2. I submit this affidavit in support of the government's motion to detain Roman Valdma ("Valdma"), who was arrested on November 20, 2003 in connection with an ongoing DSS investigation into a visa fraud scheme designed to facilitate the transport of women from Estonia to the United States for illegal commercial, sexual activity. This affidavit is based on my personal involvement in that investigation, my training and experience, and on information provided to me by other law enforcement officers who participated in the investigation.

3. Valdma was born and raised in Estonia. In 1991, he emigrated to the United States and, in July, 2000, he became a naturalized citizen of the United States, while retaining his Estonian citizenship. Valdma's parents and brother remained in Estonia after Valdma emigrated. Since 1991, Valdma has returned to Estonia regularly to visit his family, friends and associates with whom he maintained relations there.

4. Since at least 1999, Valdma has operated an erotic massage business at two locations in Brighton, Massachusetts, in which the clients receive erotic massages with a "special ending." From 1999 - 2003, Valdma recruited young women from Estonia to work in his erotic massage business. Valdma deceived most of these women about the true nature of his business, telling

them that their job would consist of providing therapeutic massage to his massage clients. Only after they arrived in the United States did Valdma disclose to most of the women the erotic nature of the massages they were required to provide.

5. The Estonian women that Valdma recruited to work in erotic massage business knew very little English when they arrived in this country. None of them had been to the United States before and none of them knew anyone in the United States other than Valdma. Although most of these women balked when Valdma finally told them that their job was to provide erotic massages to his clientele, Valdma refused to allow them to leave his employ. Valdma insisted that they work for him at least until they repaid the cost of their airline tickets from Estonia to the United States, and he threatened them with reprisals if they refused or fled.

6. Females 2, 3 and 4 each reported that Valdma was threatening, domineering, and emotionally and physically abusive toward them in the United States. Because each of these women also lived at one of Valdma's two massage locations, Valdma oversaw their daily activities. He threatened to report each of these women to the police and/or the immigration authorities if they did not comply with his orders. He exhorted the women never to disclose that they worked for him and not to disclose the erotic content of the massages they provided. Valdma physically assaulted Female 2 on two separate occasions and threatened to kill her in one of those encounters. He also threatened to hire someone to kill Female 3 if she ever told anyone about his business or her role in it. Valdma further intimidated these women by repeatedly referring to his connections in the Russian Mafia.

7. Valdma assisted the Estonian women in securing visas to enter the United States by instructing them, directly and indirectly, to provide false information on their visa applications about their employment status in Estonia, the purpose of their trip to the United States, and

whether they intended to work in the United States. Valdma also provided these women, directly and indirectly, with fraudulent documents to attach to their visa application to verify their claimed employment in Estonia. Valdma had at least four accomplices in Estonia with whom he worked to effectuate these visa frauds.


8. Jane Lanik ("Lanik") worked for Valdma beginning in December, 1999. Ultimately, she married Valdma in Las Vegas in November, 2000. On August 5, 2003, the day of Valdma's arrest pursuant to a complaint alleging visa fraud, Lanik attended his initial appearance. Lanik telephoned Female 2 that same day. Female 2 and Lanik had not spoken in several months. Lanik told Female 2 not to say anything against Valdma. She also told Female 2 to tell Female 3 not to say anything against Valdma.

9. On August 20, 2003, Female 3 received two telephone calls from Valdma's cellular telephone. Her cellular telephone rang, and she saw his name reflected on the caller identification. When she originally started using the telephone in 2002 she assigned (617) 331-2599 to Valdma in the caller identification function of her cellular telephone. The number is presently assigned to Roman Valdma through T-Mobile and has been since at least March, 2001. Upon receipt of the first telephone call, she sent a cellular text message to Diplomatic Security Service Special Agent Nicholas Porter that read the following: "I just got off the train. Roman is trying to call me. I'm not answering...Now I'm really afraid." Ultimately, Special Agent Porter also saw Valdma's name reflected on Female 3's caller identification from the second telephone call from that day.

10. On August 23, 2003, Valdma once again attempted to contact Female 3 via her cellular telephone. She did not answer and contacted Special Agent Porter. The last time she and Valdma spoke was in September, 2002 when she left his Brighton home.

11. In early October, 2003, Female 4 received a call on her cellular telephone. Her caller identification function did not reveal the identity of the number placing the call, it only reflected that it was private number. She did not answer. Within minutes, Female 4 received another telephone call from an individual she knew as "Yak." Yak is a friend of Valdma's that she had met, but he was not a friend of hers nor had she ever spoken to him on the telephone. Yak said that he was calling to see how she was doing and then asked her what she had told the authorities about Valdma. She declined to discuss it with him. The conversation was short.

Signed under the penalties and pains of perjury.


GERARDO F. BRILLANTES
Special Agent, Diplomatic Security Service

Dated: November 24, 2003